

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

# REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

FFEB 1 3 2015

REPLY TO THE ATTENTION OF:

# CERTIFIED MAIL 7009 1680 0000 7679 6453 RETURN RECEIPT REQUESTED

Mr. Mark Schlaikowski Plant Engineer Therm-Tech of Waukesha, Incorporated 301 Travis Lane Waukesha, Wisconsin 53186

> Re: Notice of Violation Compliance Evaluation Inspection WID988638656

Dear Mr. Schlaikowski:

On January 13, 2015, representatives of the U.S. Environmental Protection Agency and Wisconsin Department of Natural Resources (WDNR) inspected Therm-Tech of Waukesha, Inc. located in Waukesha, Wisconsin (hereinafter "Therm-Tech," "facility," or "you"). As a generator of hazardous waste, Therm-Tech is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Therm-Tech's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Therm-Tech, EPA's review of records pertaining to Therm-Tech, and the inspector's observations, EPA has determined that Therm-Tech violated RCRA requirements related to hazardous waste determinations and used oil as described in paragraphs 1 and 2, below.

#### 1. Hazardous Waste Determination

Under Wis. Admin. Code § NR 662.011 [40 CFR § 262.11], a generator who generates a solid waste, as defined in Wis. Admin. Code § NR 661.02 [40 CFR § 261.2], must determine whether its waste is hazardous. The generator may determine if its waste is hazardous by using the following methods: 1) determine if the waste is excluded from regulation under s. NR 661.04 [40 CFR § 261.4], 2) determine if the waste is listed as hazardous waste in Subchapter D of Chapter NR 661 [Subpart D of 40 CFR Part 261], and 3) determine if the waste exhibits a characteristic of hazardous waste as identified in Subchapter C of Chapter

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NR 661 [Subpart C of 40 CFR Part 261] by testing the waste or applying knowledge of the hazard characteristic of the waste in light of the materials or process used.

At the time of the inspection, Therm-Tech had not made a determination whether the waste aerosol cans generated in its Building 211 maintenance area were hazardous waste, and the cans were being disposed with general refuse without being punctured or recycled. Therm-Tech, therefore, is in violation of the abovementioned requirement.

# 2. <u>Used Oil Requirements</u>

Under Wis. Admin. Code § NR 679.22(3)(a) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

At the time of the inspection, a 55-gallon drum near the vacuum furnaces in Building 305, two totes in Building 303, one tote in Building 211, and two totes and one 55-gallon drum at the 1511 Pearl Street location that contained used oil were not labeled with the words, "Used Oil." Therm-Tech, therefore, is in violation with the abovementioned requirement for used oil generators.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above requirements. You should submit your response to Brian Kennedy, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Brian Kennedy, of my staff, at (312) 353-4383 or at kennedy.brian@epa.gov.

Sincerely,

Gary J. Victorine, Chief

RCRA Branch

**Enclosures** 

cc: Randall Malek, WDNR, <u>randall.malek@wisconsin.gov</u>
Michael Ellenbecker, WDNR, <u>michael.ellenbecker@wisconsin.gov</u>

<sup>&</sup>lt;sup>1</sup> Please see the enclosed guidance documents on management options for waste aerosol cans, as well as http://dnr.wi.gov/topic/Waste/HazardousFAQ.html.



9442.1993(02)

United States Environmental Protection Agency Washington, D.C. 20460 Office of Solid Waste and Emergency Response

October 7, 1993

Mr. Gregory L. Crawford Vice President, Recycling Operations Steel Recycling Institute Foster Plaza X 680 Anderson Drive Pittsburgh, Pennsylvania 15220

Dear Mr. Crawford:

Over the past several years we have received numerous questions concerning the regulatory status of used aerosol cans under the Resource Conservation and Recovery Act (RCRA) hazardous waste regulations. I understand that confusion about these issues may be hindering your efforts to increase steel aerosol can recycling in this country. As environmentally protective recycling is an important part of the Agency's waste management goals, I hope that this letter will help to answer some of these questions.

#### RESIDENTIAL AEROSOL CANS

First, I would like to emphasize that under the federal RCRA regulations, household waste (including aerosol cans) is excluded from the definition of hazardous waste (40 CFR 261.4(b)(1)). Thus, any aerosol cans generated by households are not regulated as hazardous waste. Because this exclusion attaches at the point of generation (i.e., the household) and combines to apply throughout the waste management cycle, household aerosol cans collected in municipal recycling programs and subsequently managed in recycling programs continue to be excluded from the hazardous waste management regulations.

The data you submitted (see footnote 1) appear to confirm that the majority of used residential aerosol cans contain very little residual product or propellant. Along with your experience working with many of the 600 or more communities currently recycling these cans, the data suggest that aerosol cans can be effectively recycled. The Agency does recommend that communities running residential steel recycling programs educate their participants to recycle only empty steel aerosol cans. Participants could also be educated to: 1) purchase only the amount of consumer products that they need to minimize the quantities of unused products, 2) give unused products to someone else who can use them, 3) take unused or partially full containers to a household hazardous waste collection program if available, or 4) dispose of the partially full containers as directed on the label.

## COMMERCIAL/INDUSTRIAL AEROSOL CANS

I understand that you are also interested in facilitating the recycling of aerosol cans generated by commercial or industrial generators. The remainder of this letter discusses only these non-household waste items.

We have been asked whether aerosol cans exhibit the characteristic of reactivity. At this time, the Agency is not able to determine whether various types of cans that may have contained a wide range of products are reactive. However, a steel aerosol can that does not contain a significant amount of liquid would clearly meet the definition of scrap metal (40 CFR 261.1(c)(6)), and thus would be exempt from RCRA regulation under 40 CFR 261.6(a)(3)(iv) if it were to be recycled. Therefore, a determination of reactivity or any other characteristic would not be relevant. Aerosol cans that have been punctured so that most of any liquid remaining in the can may flow from the can (e.g., at either end of the can), and drained (e.g., with punctules end down), would not contain significant liquids.

It should be noted that since the process of emptying the aerosol cans is part of a recycling process (i.e., scrap steel recycling), this activity would be exempt from RCRA regulation under 40 CFR 261.6(c) (except as specified in 40 CFR 261.6(d)). The Agency recommends that these activities be conducted in a safe and environmentally protective manner and that care be taken to properly manage any contents removed from the container (both liquids and gases). Any liquids or contained gases removed from aerosol cans may be subject to regulation as hazardous wastes if they are listed in Subpart D of 40 CFR Part 261 or if they exhibit any characteristics of hazardous waste as described in Subpart C of

#### 40 CFR Part 261.

We have also been asked to determine whether used aerosol cans would meet the definition of "empty" under 40 CFR 261.7. Again, if the steel cans are being recycled, it is not necessary to determine whether they are "empty" under the criteria listed in 40 CFR 261.7. As long as an aerosol can being recycled does not contain significant liquids, the can is exempt as scrap metal. However, in order to dispose of a can as non-hazardous waste (rather than recycle it), a generator would have to determine that the can is empty under 40 CFR 261.7 (or that the product it contained was not hazardous), and that the can itself is not hazardous. If a can is to be disposed of, and either contains or is hazardous waste, it must be managed under all applicable regulations.

Please be aware that this letter addresses only the federal hazardous waste regulations. Authorized State agencies implement the RCRA program in their states (although some parts of the program may be implemented by the U.S. EPA Regions), and that state regulations may be more stringent than the federal regulations. Anyone managing aerosol cans should contact the appropriate state environmental agency or U.S. EPA Regional Office to determine how the regulations of that particular state will apply to their activities.

I hope this information is useful in your efforts to increase steel recycling. Thank you for the assistance that you and the Steel Recycling Institute have provided my staff in researching these issues. If you have any further questions, please call Charlotte Mooney of my staff at (202) 260-8551.

Sincerely, Jeffrey D. Denit Acting Director Office of Solid Waste

cc: Waste Management Division Directors, U.S. EPA Regions I - X

1 Texas Steel Aerosol Can Recycling Program, Final Report; Steel Can Recycling Institute (now Steel Recycling Institute), December 7, 1992.

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9442.1994(01)

United States Environmental Protection Agency Washington, D.C. 20460 Office of Solid Waste and Emergency Response

January 4, 1994

Mr. Michael C. Campbell Katec Incorporated P.O. Box 3399 Virginia Beach, Virginia 23454

Dear Mr. Campbell:

Thank you for your letter of November 12, 1993, commenting on our letter of October 7, 1993, concerning regulation of waste aerosol cans under the Resource Conservation and Recovery Act (RCRA) hazardous waste regulations. We appreciate your interest in the safe and environmentally protective management of these wastes.

As we indicated in our letter, we are not at this time able to make a categorical determination as to whether various types of cans that may have contained a wide range of products exhibit the characteristic of reactivity. It remains the responsibility of the generator of any particular waste to make this determination (see 40 CFR 262.11). However, as we indicated in the letter, a steel aerosol can that does not contain a significant amount of liquid (e.g., a can that has been punctured and drained) would meet the definition of scrap metal (40 CFR 261.1(c)(6)), and, if it is to be recycled, would be exempt from regulation under 40 CFR 261.6(a)(3)(iv). Scrap metal that is recycled is exempt from RCRA regulation under this provision even if it is hazardous waste, so generators need not make a hazardous waste determination. Scrap metal that is not recycled, however, is subject to the hazardous waste regulations if it is hazardous, so generators must make a hazardous waste determination.

We appreciate your safety concerns and stress that persons managing both regulated wastes and wastes that are exempt under recycling exemptions should take all necessary precautions to ensure that the wastes are managed safely. Thank you again for your interest in this issue. Sincerely, Michael H. Shapiro Director Office of Solid Waste



# U.S. ENVIRONMENTAL PROTECTION AGENCY Region 5, Land and Chemicals Division RCRA Branch, LR-8J 77 West Jackson Boulevard Chicago, Illinois 60604

# COMPLIANCE EVALUATION INSPECTION REPORT

INSPECTION DATE:

January 13, 2015

SITE NAME:

Therm-Tech of Waukesha, Inc.

**ADDRESS:** 

301 Travis Lane

Waukesha, Wisconsin 53186

EPA ID NUMBER:

WID988638656

**GENERATOR STATUS:** 

Large Quantity Generator (2014)

Conditionally Exempt Small Quantity Generator (2015)

NAICS CODE:

332811 Metal Heat Treating

**FACILITY CONTACT:** 

Mark Schlaikowski

Plant Engineer

**EPA INSPECTOR:** 

Brian Kennedy

Environmental Engineer Compliance Section 2

RCRA Branch

Land and Chemicals Division

PREPARED BY:

Brian Kennedy

Date

ACCEPTED BY:

Julie Morris, Chief

Compliance Section 2

Date



**Purpose of Inspection** 

An unannounced Compliance Evaluation Inspection (CEI) of Therm-Tech of Waukesha, Inc. (hereinafter "Therm-Tech" or "facility") located at 301 Travis Lane, Waukesha, Wisconsin took place on January 13, 2015. The CEI was conducted by U.S. Environmental Protection Agency and Wisconsin Department of Natural Resources (WDNR) personnel and was an evaluation of the facility's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA) and its implementing regulations found in the Wisconsin Administrative Code and the Code of Federal Regulations. More specifically, the CEI was an evaluation of Therm-Tech's compliance with the regulations governing generators of hazardous waste.

**Participants** 

The following persons were present for part or all of the inspection:

Mark Schlaikowski - Plant Engineer

Therm-Tech

Mary Beth Wiberg-Springer - Executive Vice President and General Manger

Therm-Tech

Randall Malek - Waste Management Specialist

**WDNR** 

Brian Kennedy - Environmental Engineer

U.S. EPA

## Introduction

I arrived on site at 9:00 AM CST and met with Randall Malek outside of Therm-Tech's main office. Mr. Malek and I entered and introduced ourselves to the receptionist and requested to see a facility environmental coordinator or safety manager. A few minutes later we were introduced to Mary Beth Wiberg-Springer, Therm-Tech's Executive Vice President and General Manager and Mark Schlaikowski, Therm-Tech's Plant Engineer. Randall and I were led to an office to proceed with an opening conference with Ms. Wiberg-Springer, Mr. Schlaikowski, and several other Therm-Tech representatives. I presented Ms. Wiberg-Springer my enforcement officer credentials and business card and provided the Small Business Resources information and Pollution Prevention contact sheets. I described the purpose of the U.S. EPA RCRA inspection and the process by which I would conduct the inspection, including a facility walk-through which would include photographs of hazardous waste storage areas, as well as a review of Therm-Tech records pertaining to hazardous waste.

I informed Therm-Tech of their right to make a confidential business information claim over the information and documents collected during the inspection.

Site Description

The following information about Therm-Tech is based on personal observations of the EPA inspector and on representations made during the inspection by facility personnel identified above or within the text unless otherwise specified.

Opened in May of 1982, Therm-Tech specializes in a variety of heat treating processes for steel castings and forgings, machined parts and stampings, gears, aluminum and weldments. Therm-Tech heat treats metal parts for upwards of 600 different customers, utilizing special furnaces

and cooling (quenching) techniques to transform the physical properties of the metal such as hardness and brittleness. Therm-Tech serves industries such as oil and gas extraction, trucking, and other heavy equipment manufacturers. Heat treating and other processes available at Therm-Tech include stress relieving, annealing, normalizing, water, oil and polymer quenching and hardening, marquench hardening, vacuum hardening, carburization, nitriding, austempering, cryogenic treatment, straightening, shot blasting, and mechanical testing. Therm-Tech currently has 143 employees and operates 24 hours a day, seven days a week on a three shift schedule.

Therm-Tech's location on Travis Lane is comprised of Building 301, which incorporates a main office and general casting and forging heat treatment processes; Building 303, which houses Allcase heat treating furnaces; Building 305, which houses vacuum furnaces and nitriding processes; and Building 211, which is a general maintenance shop and storage area. Several years ago, Therm-Tech also leased a second production building at 1511 Pearl Street in Waukesha, approximately 3.3 miles northwest from the Travis Lane location. The Pearl Street location houses air cooling operations, additional Allcase furnaces, and general warehouse space.

Therm-Tech generates hazardous waste in the form of spent hydrochloric acid and caustic solutions from the nitriding process in Building 305. The acidic and caustic solution baths are changed out infrequently, approximately once every several years, and are characterized as D002 hazardous waste when disposed. Hazardous waste is also generated as chromium-containing salt deposits that accumulate in wash tanks that are used to rinse off pieces that have undergone molten salt quenching. Treated pieces are dipped into wash tank water in steel baskets and any molten salt residue is dissolved away. Over time, salt deposits and residue accumulate in the bottom of the wash tanks. Several wash tanks are utilized around the facility to rinse pieces that have been quenched in molten salt; however, only the salt deposits from certain wash tanks have been characterized as D007 hazardous waste for chromium. Other wash tank salt deposits have been determined to be non-hazardous waste. Therm-Tech refers to its salt deposits as heat treat salts. Wastewaters generated in the wash tanks are discharged into the city sewer, along with other wastewaters and non-contact cooling waters generated throughout the facility. No wastewater is treated on site. Therm-Tech contracts with Advanced Waste Services to characterize, manage and ship its hazardous waste streams.

Other waste streams generated on site include used oil, aerosol cans, universal wastes and mineral spirits. Used oil is generated from several sources around Therm-Tech, including pumps from the vacuum furnaces in Building 305 and the Allcase furnace quench tanks in Building 303. The used oil is accumulated in 275-gallon totes or 55-gallon drums. When either of these containers are filled, they are moved to Building 211 for storage. Depending on the source of the used oil, whether from crankcase oil in forklifts or quenching oil from heat treating, some oil may be sent for reprocessing and returned to Therm-Tech while other is sent for general recycling. OSI Environmental picks up used oil generated by Therm-Tech. Waste aerosol cans are generated in the maintenance shop but are not managed as hazardous waste and are disposed with other trash. Universal wastes, primarily light bulbs, are taken to a nearby scrap yard soon after they are generated. Therm-Tech stated that the most recent light bulb installation around the facility included "green bulbs," or lamps that can be disposed with general refuse. A parts washer in Building 211 uses mineral spirits; however, the material has a high flash point.

Therm-Tech utilizes shot blasting in both Building 301 and the 1511 Pearl Street location to resurface pieces. The shot blasting process generates a waste dust that is collected in 55-gallon drums in an outdoor dust collector at Building 301. The shot blast dust is collected indoors in 55-gallon drums at the Pearl Street location. All drums of shot blast dust are consolidated and stored in a waste storage area in the east end of the Pearl Street facility. When enough drums are accumulated (approximately 40 55-gallon drums), Therm-Tech has the material picked up by PremierMetals, Inc. of Indianapolis, and sent to Connelly-GPM, Inc. of Chicago. Connelly-GPM uses Therm-Tech's shot blast dust as an ingredient in iron sponge, a gas purification product which removes hydrogen sulfide and mercaptan from various sulfur-containing gas sources. Therm-Tech has not had the shot blast dust tested or analyzed as a solid waste.

In addition to the shot blast dust, Therm-Tech also consolidates and stores its hazardous and non-hazardous salt deposits in the waste storage area at the Pearl Street location. Therm-Tech personnel transport any salt deposits generated at the Travis Lane location to the Pearl Street location on their own trucks for storage prior to pick up by Advanced Waste Services. The hazardous waste acid and caustic solutions generated in Building 305 remain at Travis Lane when they are picked up by Advanced Waste Services.

Therm-Tech employees use cellphones to communicate with each other. A personal address system installed at both Travis Lane and Pearl Street allows simultaneous communication between both locations. The Waukesha Fire Department frequently visits Therm-Tech for inspections and there are fire extinguishers available throughout the facility which are regularly monitored.

# Facility Walk-Through

Mr. Schlaikowski led Mr. Malek and myself through the facility. We started first in Building 301, a general casting and forging treatment area that is adjacent to the main office. Inside Building 301 were several furnaces and molten salt quenching tanks. Mr. Schlaikowski briefly explained the molten salt quenching process and the wash tanks, where parts are dipped into water to rinse off salt residue. Mr. Schlaikowski pointed out one particular wash tank in the area, and stated that when salt deposits are removed from this tank they are characterized as hazardous waste for chromium. The wash tank is cleaned out approximately once a year as part of preventative maintenance. Water from the wash tanks is discharged directly to the sewer. Mr. Schlaikowski stated the City of Waukesha Water Department regularly visits the facility to test its discharge. In the southwest corner of Building 301 was a small shot blasting area where pieces are resurfaced. Ductwork attached to the blast area led to dust collector outside the southwest corner of the building. Underneath this dust collector were two 55-gallon drums collecting shot blast dust (See Photo 1 in Attachment A: Inspection Photographs).

The tour continued to Building 305, where Mr. Schlaikowski pointed out the five vacuum furnaces present in the northern half of the building. The furnaces are used to harden pieces within a vacuum and each furnace utilizes a pump to maintain that vacuum. The pumps generate used oil, and there were several oil drip buckets collecting free used oil in the area. When the buckets are filled, they are drained into a nearby 55-gallon drum (See Photo 2). The 55-gallon drum observed was not labeled as "Used Oil." Mr. Schlaikowski led the tour past several workstations and tooling areas to the southern half of Building 305 where nitriding takes place.

In the area were three sequential 400-gallon tanks in an in-ground concrete pit. Two of the tanks were the caustic and acidic solutions that, when disposed, are managed as D002 hazardous waste. The third tank is a neutral dip solution. Photo 3 displays the acid dip tank. Mr. Schlaikowski explained that these pretreatment tanks are used to clean and etch the surface of metal pieces prior undergoing gas nitriding. Adjacent to the tanks was the actually nitriding area, where heated pieces are exposed to ammonia to harden their surface.

Mr. Schlaikowski next led the tour to Building 303, where Therm-Tech houses six Allcase furnaces. The Allcase furnaces were described as "all-in-one" furnaces that are able to heat and oil quench pieces within one standalone unit. Mr. Malek and I observed several of the furnaces in the area heat and transfer batches of metal pieces. Each Allcase furnace has its own oil quench tank which is contained in an in-ground concrete pit. Spent quench oil is drained into one of two used oil totes in the area. One tote services the three larger Allcase furnaces, while the second tote is used for the three smaller furnaces (See Photos 4 and 5). The two totes were not labeled as "Used Oil." Mr. Schlaikowski stated the first tote was improperly labeled as "Propylene Glycol." I asked Mr. Schlaikowski about several 55-gallon drums in the area that had covers that appeared to be leading from the furnaces' quench tanks. He stated that these were "burp" drums which catch any quench oil that reacts violently with heated pieces when they are dipped. These drums are emptied back into the quench tank as needed.

The site tour continued to Building 211, a standalone maintenance and storage shop just west of Building 305. Inside was a small chemical and waste storage area that contained a tote of used oil that was waiting for shipment (See Photo 6). The tote was not labeled as "Used Oil," but instead was marked as "Virgin Oil." To the left of the tote was a 55-gallon drum of "Davies High Flash Mineral Spirits," which is used in the single parts washer in the building. No other waste was observed in the area. I observed numerous aerosol cans in the area and asked Mr. Schlaikowski how Therm-Tech manages the cans when they are empty. He said Therm-Tech does not manage them in any particular way, and instead just disposes the cans with regular trash.

At this point it was decided to drive to Therm-Tech's 1511 Pearl Street location. Mr. Malek and I drove in a separate car and followed Mr. Schlaikowski to Pearl Street.

Mr. Schlaikowski led us inside the west end of the Pearl Street building, a large processing area where Therm-Tech conducts air cooling, shot blasting, molten salt quenching, and maintains several additional Allcase furnaces. Much of the floor space in the building was empty, and Mr. Schlaikowski said Therm-Tech was hoping to install more production capacity in the coming years. I walked around the shot blast dust collectors and several shot blast dust drums in the area (See Photo 7). One of the dust drums was open and I observed a fine grey and brown dust inside.

The tour continued east through the Pearl Street location. In an area in the center of the building were two totes and one 55-gallon drum of used oil that were ready for off-site shipment (See Photos 8 and 9). The containers were labeled as "Waste Oil." Mr. Schlaikowski led us through a staging area that housed many containers of pieces waiting for treatment. Many of the pieces were oil and gas extraction equipment. Further east into the building was Therm-Tech's primary waste storage area. There were approximately 20 55-gallon drums of shot blast dust and five 55-

gallon drums of non-hazardous "High Heat Salt" deposits in the area, adjacent to a several large pieces of scrap metal (See Photos 10, 11 and 12). Many of the shot blast dust drums were stacked on one another. Both the drums of shot blast dust and salt deposits were dated, the majority of them within the past two months. At the easternmost side of the Pearl Street location was a locked gated area where Therm-Tech was storing old or unusable equipment and several vehicles. No waste material was observed in this area.

Mr. Schlaikowski, Mr. Malek and myself drove back to the Travis Lane location for a review of records. No hazardous wastes or universal wastes were observed during the site tour.

# **Record Review**

After returning to the Travis Lane location, Mr. Malek and I joined Mr. Schlaikowski and Ms. Wiberg-Springer for a records review. I requested the following documents for review:

- . Therm-Tech's hazardous waste manifests and related land disposal restriction notification forms for the previous three years
- Annual hazardous waste reports as submitted to WDNR for the previous three years
- Waste characterization or determination records for Therm-Tech's waste streams
- Therm-Tech's contingency or emergency response plan
- Personnel training records for the previous three years
- Hazardous waste storage area inspection logs, if available.

A diagram of the Therm-Tech facility can be seen in Attachment B.

After summarizing the records I would need to review, Ms. Wiberg-Springer explained that much of the materials were not readily available. She explained that Advanced Waste Services manages most the abovementioned records and that Therm-Tech would need to contact them in order to produce these documents. Additionally, some of the records requested were either wholly or partially computerized, including personnel training records, and would require some time to put them together. However, Ms. Wiberg-Springer did provide a copy of a bill of lading for a recent shipment of non-hazardous heat treat salt by Advanced Waste Services. The bill of lading displays the shipment of seven 55-gallon drums (4,000 pounds) of heat treat salts on 12/9/2014 from Therm-Tech's Pearl Street location. See Attachment C for this bill of lading.

# Closing Conference

I summarized my review of the site to Ms. Wiberg-Springer, Mr. Schlaikowski, and several other Therm-Tech representatives. I mentioned that I did not see any hazardous waste during the tour, but until I reviewed previous manifests and other records, I could not fully evaluate Therm-Tech's compliance with RCRA at that time. I explained that depending on Therm-Tech's hazardous waste generator status, its hazardous waste management requirements can change drastically. I reminded them that I would need to see the abovementioned documents in order to complete my evaluation. However, I was able to comment on Therm-Tech's used oil management. I stated that the containers I viewed around the site, including drums and totes, need to be labeled as "Used Oil," for both the oil that is returned to Therm-Tech for reuse and the oil that is not. I also recommended that Therm-Tech utilize an aerosol can puncturer to empty its waste cans and sell them as scrap. I told Mr. Schlaikowski that I would likely have several

follow-up questions related to Therm-Tech's waste management practices. I stated the company would receive a report that would summarize the inspection and any issues that were identified.

The inspection ended around 11:30 AM.

# Inspection Follow-Up

On January 14, 2015, the day after the inspection, I sent Mr. Schlaikowski a reminder and summary of the Therm-Tech records I would need to review in order to complete my evaluation. I requested that the documents be provided by email or regular mail.

On January 22, 2015, I sent Mr. Schlaikowski a second email with several questions regarding Therm-Tech's waste management practices, including questions related to the shot blast dust and the transfer of waste between the Travis Lane and Pearl Street locations.

On January 22, 2015, I received a package of documents from Ms. Wiber-Springer. The package contained Therm-Tech's annual hazardous waste report exemption forms to the WDNR for 2012 and 2013, hazardous waste manifests and other shipment documents, Therm-Tech's Emergency Response Plan, and employee training records.

Therm-Tech's 2012 and 2013 Annual Hazardous Waste Report Exemption Forms were completed by Sigma Environmental Services, Inc. In 2012, Therm-Tech reported a nongenerator of hazardous waste but also stated that it was currently a Small Quantity Generator as of the date of the reporting, 2/25/2013. In the 2013 report, Therm-Tech reported again as a nongenerator, and as of the date of the reporting on 1/28/2014, Therm-Tech was currently a nongenerator. These documents can be seen in Attachment D.

Therm-Tech's most recent hazardous waste shipment occurred on 7/16/2014, and displays the removal of seven drums (385 gallons) of D002, D007 and D008 hydrochloric acid solution, and 15 drums (825 gallons) of D007 "tank bottom heat treat sludge," or the hazardous salt deposits in the wash tanks, from the Travis Lane location. The waste was transported by Advanced Waste Carriers to Badger Disposal in Milwaukee. The shipment on 7/16/2014 also included eight drums of non-hazardous heat treat salts, which were also transported to Badger Disposal. Ten drums of non-hazardous heat treat salts were also removed from Therm-Tech on 2/14/2014 by Advanced Waste Services, and another 22 drums were removed a few months prior on 11/8/2013. Only two hazardous waste shipment prior to the 7/16/2014 shipment were observed, including three drums of D007 waste sludge on 12/6/2011 and two drums of D007 sludge on 11/25/2011. The hazardous waste manifests are in Attachment E.

Therm-Tech's Emergency Response Plan includes on its cover page emergency phone numbers for the local police and fire department, WDNR numbers for violations and emergency spills, and gas and electric utilities. The plan itself describes evacuation procedures for facility work areas and emergency notification procedures for both employees and local authorities. The Emergency Response Plan is in Attachment F.

Therm-Tech provided a large selection of employee training plans, including training logs which list the courses taken by the employees, the dates they were completed, and the building in which

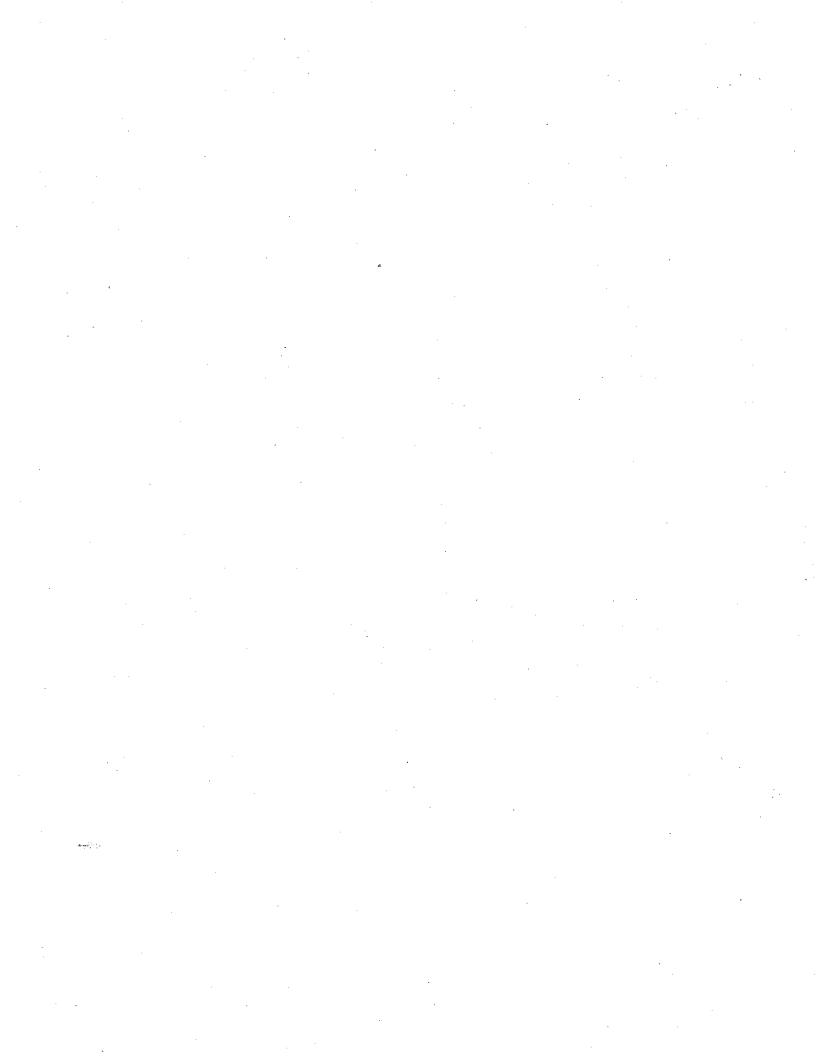
each employee worked. Training courses included personal protective equipment, fire safety, emergency evacuation procedures, hazard communication, and waste disposal procedures.

On January 27, 2015, Mr. Schlaikowski responded to my January 22 email and provided several documents from Connelly-GPM and PremierMetals that describe the use of Therm-Tech's shot blast dust as an ingredient in iron sponge. A letter describing the use of the shot blast dust and an MSDS of iron sponge are in Attachment G.

An inspection checklist is in Attachment H.

# **Attachments**

- A. Inspection Photographs
- B. Facility Diagram
- C. Bill of Lading for Heat Treat Salts
- D. Annual Hazardous Waste Reports
- E. Hazardous Waste Manifests
- F. Emergency Response Plan
- G. Shot Blast Dust Information
- H. Inspection Checklist



ATTACHMENT A: Inspection Photographs
Photographs were taken by Brian Kennedy using a Canon PowerShot A2400 IS Digital Camera.



Photo 1: A dust collector collecting shot blast dust outside the southwest corner of Building 301.

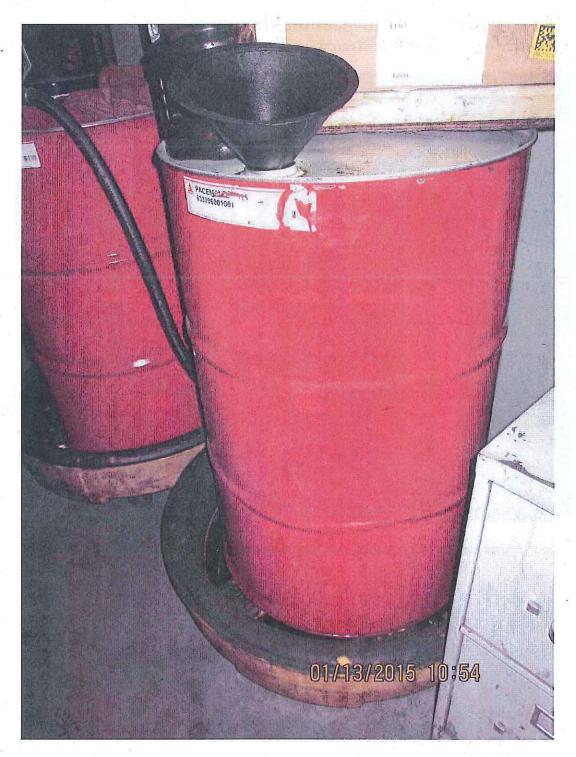


Photo 2: A 55-gallon drum collecting used oil near the vacuum furnaces in Building 305. The drum was not labeled as "Used Oil."

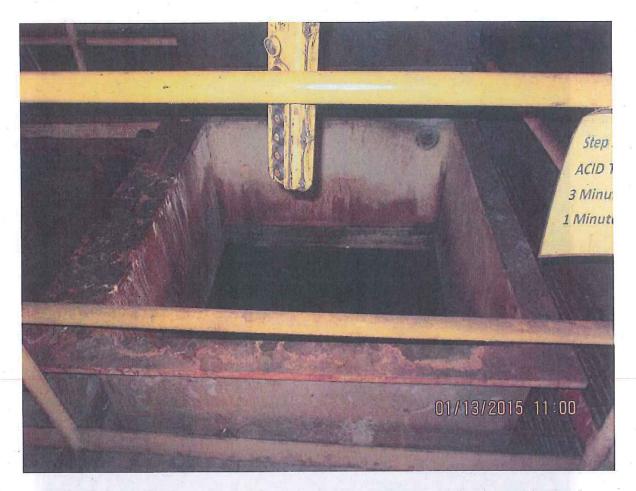


Photo 3: The acid etching tank near the nitriding process in Building 305. The caustic cleaning tank (not pictured) is to the left of this tank. All tanks were in an in ground concrete pit.

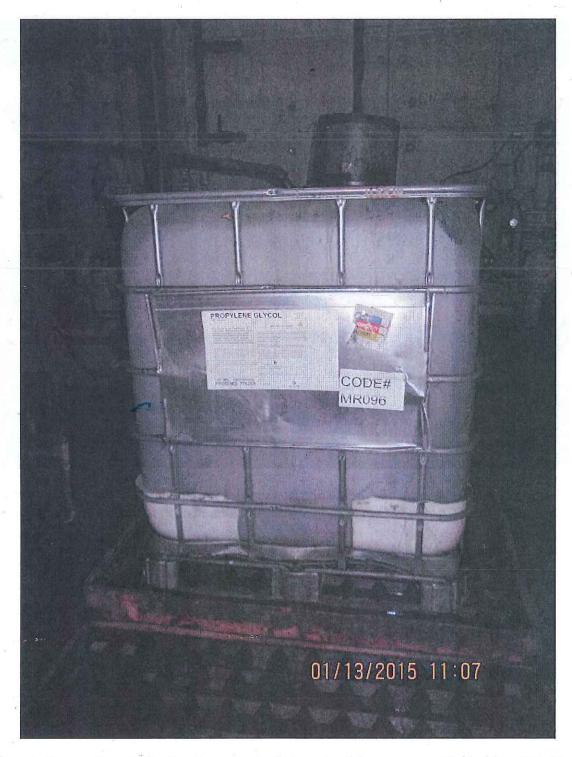


Photo 4: A tote of used oil collecting quench oil from the Allcase furnaces in Building 303. The tote was not labeled as "Used Oil."

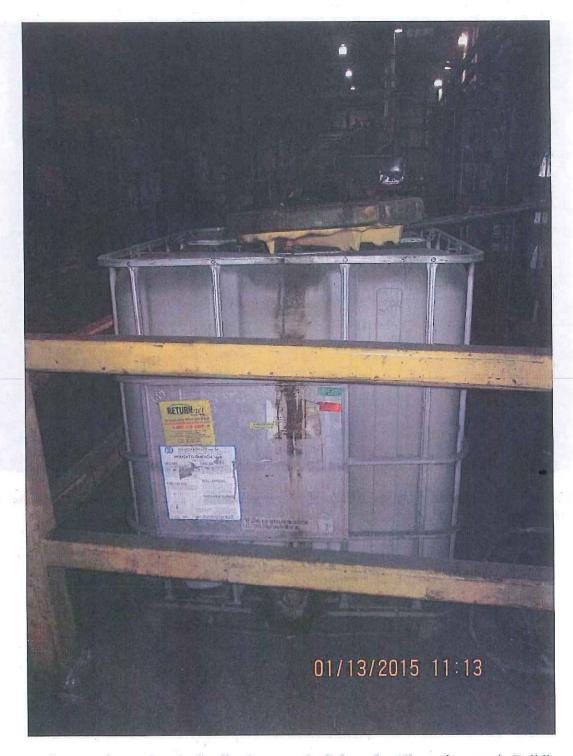


Photo 5: A second tote of used oil collecting quench oil from the Allcase furnaces in Building 303. The tote was not labeled as "Used Oil."



Photo 6: A tote of used oil in the maintenance area in Building 211. The tote was not labeled as "Used Oil."

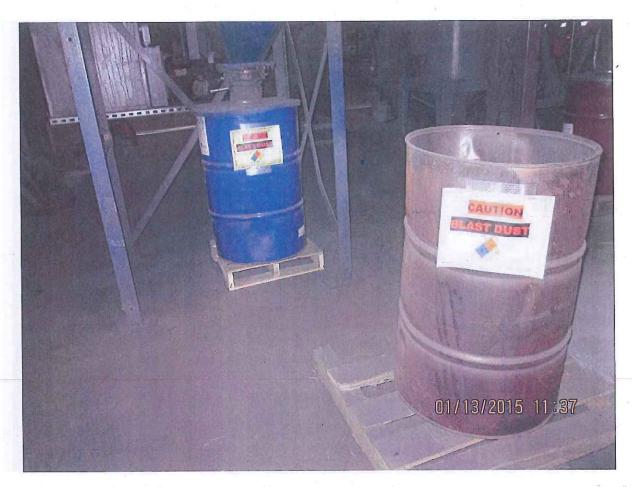


Photo 7: Two 55-gallon drums of shot blast dust at the Pearl Street location.



Photo 8: Two totes of used oil at the Pearl Street location. Neither tote was labeled as "Used Oil."

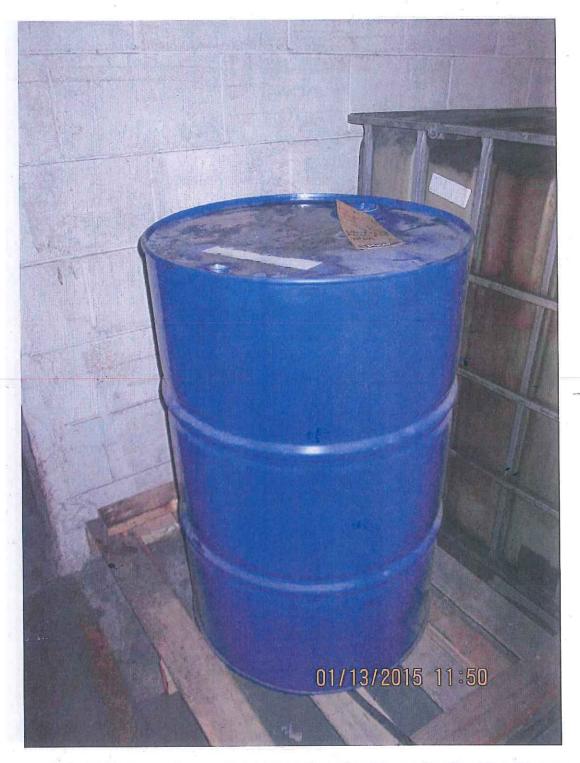


Photo 9: A 55-gallon drum of used oil at the Pearl Street location. The drum was not labeled as "Used Oil."

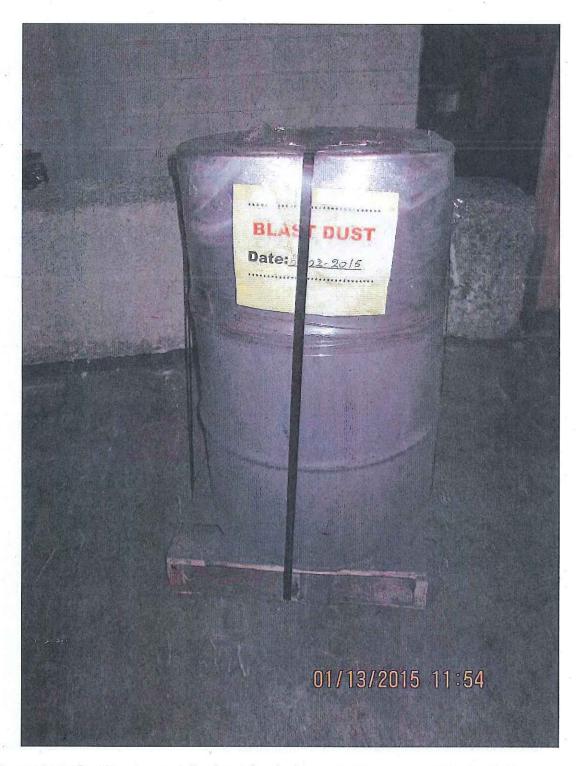


Photo 10: A 55-gallon drum of shot blast dust in the waste storage area at the Pearl Street location.

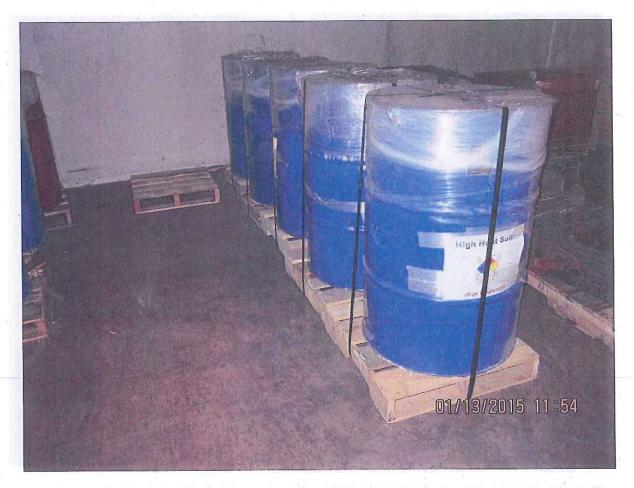


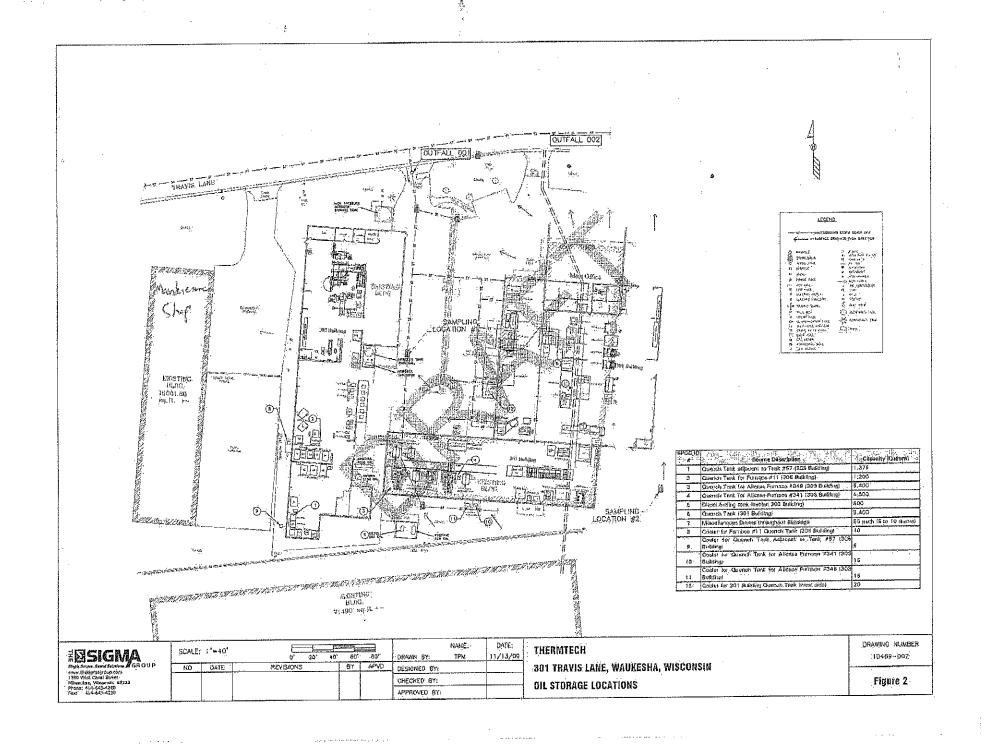
Photo 11: Five 55-gallon drums of "High Heat Salt" salt deposits in the waste storage area at the Pearl Street location.



Photo 12: Several of the approximately 20 55-gallon drums of shot blast dust in the waste storage area at the Pearl street location.

# ATTACHMENT B: Facility Diagram

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Therm-Tech of Waukesha, Inc. WID988638656 January 13, 2015

# ATTACHMENT C: Heat Treat Salts Bill of Lading

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1126 South 70th Street Suite N408B West Allis, WI 53214 www.advancedwasteservices.com (414) 847-7100 Fax: (414) 475-4496

BIII To

Attn: Alana Therm Tech of Waukesha 301 Travis Lane Waukesha WI 53186 United States

## **Payment Document**

Date Invoice # 12/9/2014 239263

Due Date PO#

Upon receipt

Results Advisor

Brushwood, //Harders

Phone Number Fax Number

(262) 549-1878 (262) 549-4320

Memo Client Message

Ship To

Therm Tech of Waukesha 301 Travis Lane Waukesha WI 53186

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## Need to schedule a Load? Call our Results Delivery Group at (866) 475-3110

Schedule a Load online @ www.advancedwasteservices.com. Click on the Pickup Tab and place your order.

This Payment Document may reflect an increase in the fuel surcharge that is necessary to help us manage the recent increase in the market price for diesel fuel.

This Payment Document falls under Advanced Waste Services, Inc. Standard Terms & Conditions found at http://www.advancedwasteservices.com/client\_resources.html unless superseded by another valid contract vehicle in place at the time these services were rendered.

Contact Advanced Waste Services at 800-842-9792 within 30 days of the invoice date for any and all billing discrepancies.

Transforming Today's Wastes Into Tomorrow's Resourcest

We accept American Express, Mastercard, Visa and Diner's Club

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## The Industrial Waste Professionals™

Corporate Office 1126 South 70° Street, Suite N408B - West Allis, Wi 53214 Phone: 809-842-9792 | For A14 476 2711

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1126 South 70th Street Suite N408B West Allis, WI 53214 www.advancedwasteservices.com (414) 847-7100 Fax: (414) 475-4496

Bill To

- การเหลือ - การเพื่อให้สะเกราะการเก

Attn: Alana Therm Tech of Waukesha 301 Travis Lane Waukesha WI 53186 United States

## **Payment Document**

Date Invoice # 12/5/2014 238905

Due Date PO# Upon receipt

Results Advisor Phone Number Fax Number

Brushwood, //Harders (262) 549-1878 (262) 549-4320

Memo Client Message

Ship To

Therm Tech of Waukesha 301 Travis Lane Waukesha WI 53186

Total

\$98,00

Need to schedule a Load?

Call our Results Delivery Group at (866) 475-3110

or

Schedule a Load online @ www.advancedwasteservices.com.

Click on the Pickup Tab and place your order.

This Payment Document may reflect an increase in the fuel surcharge that is necessary to help us manage the recent increase in the market price for diesel fuel.

This Payment Document falls under Advanced Waste Services, Inc. Standard Terms & Conditions found at http://www.advancedwasteservices.com/client\_resources.html unless superseded by another valid contract vehicle in place at the time these services were rendered.

Contact Advanced Waste Services at 800-842-9792 within 30 days of the invoice date for any and all billing discrepancies.

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8100 N. Austin Avenue Morton Grove, IL 60053-3203 P 847.957.6666 800.246.6663 F 847.967.6735 www.emt.com

#### **Analytical Report**

Bill Fowler Advanced Waste Services, Inc. 1126 S. 70th Street, Suite N408B West Atlis, WI 53214

December 03, 2014

Work Order: 14K0918

RE:

AW/S Samples

Therm Tech - Saltbath

Dear Bill Fowler:

Enclosed are the analytical reports for the EMT Work Order listed. Also included with this analytical report is a copy of the chain of custody associated with these samples, if you have any questions, please contact me.

Sincerely,

Jessica Roe For Mark Steuer

Project Manager 847,967.6666

MSteuer@emt.com

Approved for release: 12/3/2014 5:00:30PM

Jessua Ros

Approved by,

Marilyn Krueding Laboratory Director

The contents of this report apply to the sample(s) analyzed. No duplication is allowed except in its entirety, Reporting limits are adjusted for sample size used, dilutions and moisture content, if applicable.

State of Wisconsin Dept of Natural Resources, Cert No. 999888890



## Table of Contents

Cover Letter				]
Sample Summary	•	•		3
Case Narrative				4
Client Sample Results				S
Dates Report				(
Certified Analyses				7
List of Certifications			•	7
Qualifiers and Definitions	and the same of the same		A.E. 1	8
Chain of Custody				Ç





8100 N. Austin Avenue Morton Grove, IL 60053-3203 P 847.967.6666 800.246.0663 F 847.967.6735 www.emt.com

## Sample Summary

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
1411026-01	14K0918-01	Solid	11/25/14 00:00	11/26/14 16:00





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www.emt.com

Case Narrative

Client:

Advanced Waste Services, Inc.

Date: 12/03/2014

Project:

AWS Samples

Therm Tech - Salibath

Work Order:

14K0918

All reported results are within defined laboratory quality control objectives unless listed below or otherwise qualified in this report.

Work Order: 14K0918

The samples were received on 11/26/2014 4:00:00 PM. The samples arrived in good condition and properly preserved. The temperature of the cooler at receipt was 6 degrees C.

Refer to Qualifiers and Definitions for quality and analytical clarifications or deviations.





8100 N. Austin Avenue Morton Grove, IL 50053-3203 P 847,967,6666 800,246,0663 F 847,967,6735 www.emt.com

#### **Client Sample Results**

Client:

Advanced Waste Services, Inc.

Project:

AWS Samples

Therm Tech - Salibath

Work Order:

14K0918

Client Sample ID: 1411026-01

Report Date: 12/03/2014

Collection Date: 11/25/2014 00:00

Matrix: Solid

Lab ID: 14K0918-01

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Method:	ASTM D5058-90								Not	tes: H
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Water Compatibility	Pass	0.00	ХЬ	Pass/Fail		0.00	12/02/14 13:00	B4E0111	SG	1





8100 N. Austin Avenue Morton Grove, IL 60053-3203 P 847.967.6666 600.246.0663 F 847.967.6735 www.emt.com

**Dates Report** 

Client

Advanced Waste Services, Inc.

Project:

AWS Samples

Them Tech - Sallbath

Work Order:

14K0918

Report Date: 12/03/2014

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Sample ID	Client Sample ID	Collection	Hairie	Test Name	Prep Date	Prep Date	Analysis Date	Baten 10	Sequence
14140918-01	1411026-01	11/25/14	Solid	Oxidizers, Screen		12/01/14 09:50	12/01/14 09:59	B4L0017	
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-				Compatibility, Acid		12/02/14 13:03	12/02/14 13:03	B4L0112	
				Compatibility, Base		12/02/14 11:00	12/02/14 13:07	841.0114	





8100 N. Austin Avenue Morton Grove, IL 60053-3203 P 847.967.6666 800.246.0663 F 847.967.6735 www.emt.com

## **List of Certifications**

Code	Description	Number	Expires
AKDEC	State of Alaska, Dept. Environmental Conservation	UST-105	°07/16/2015
CPSC	US Consumer Product Safety Commission, Accredited by PJLA Lab No. 1050	L14-56	04/30/2016
DoD	Department of Defense, Accredited by PJLA	L14-55	04/30/2016
ILEPA	State of Illinois, NELAC Accredited Lab No. 100256	003041	07/27/2016
ISO	ISO/IEC 17025, Accredited by PJLA	L14-56	04/30/2016
LELAP	State of Louisiana, NELAC Accredited Lab No. 171344	05015	06/30/2015
WONR	State of Wisconsin Dept of Natural Resources	999888890	08/31/2015





8100 N. Austin Avenue Morton Grove, IL 60053-3203 P 847,967,6666 800,246,0663 F 847,967,6735 www.emt.com

## **Qualifiers and Definitions**

item	Description	
H X Xa Xb %Res	Sample prepared and/ or analyzed past recommended holdtime. Initial temperature-24.5 degree C,final temperature-23 degree C.No visible reaction. Initial temperature-24.5 degreeC,final temperature-23.5 degreeC.No visible reaction. Initial temperature-25 degreeC,final temperature-24 degreeC.No visible reaction. Percent Recovery	

## ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

# Chain of Custody Record

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8100 North Austin Avenue Morton Grove, Illinois 60053-3203 847-967-6666 FAX: 847-967-6735 www.emt.com

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Therm-Tech of Waukesha, Inc. WID988638656 January 13, 2015

# ATTACHMENT D: Annual Hazardous Waste Reports

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March 5, 2013

Project Reference #10469-005

Ms. Mary Wiberg-Springer Therm-Tech of Waukesha, Inc. 301 Travis Lane Waukesha, Wisconsin 53186

Re: 2012 Hazardous Waste Generator Report

Dear Ms. Wiberg-Springer:

Sigma Environmental Services, Inc. appreciated the opportunity to assist Therm-Tech of Waukesha, Inc. by completing the 2012 Hazardous Waste Generator report. The 2012 report was electronically submitted to the Wisconsin Department of Natural Resources on February 27, 2013. Enclosed please find the Hazardous Waste Report, confirmation of receipt, and supporting documentation for your records.

Please call me at (414) 643-4115 should you have any questions or require additional information.

Sincerely,

SIGMA ENVIRONMENTAL SERVICES, INC.

Nicole L. Braun Project Engineer

Wiele 1 Braun

Enclosures



February 27, 2013

Project Reference #10469-005

#### **CERTIFIED MAIL**

Hazardous Waste Reporting – WA/5
Wisconsin Department of Natural Resources
P:O. Box 7921
Madison, Wisconsin 53707-7921

Re:

2012 Hazardous Waste Report Certification

Therm-Tech of Waukesha, Inc.

301 Travis Lane

Waukesha, WI

Facility ID #268232030

To Whom It May Concern:

Sigma Environmental Services, Inc., on behalf of Therm-Tech of Waukesha, Inc., is submitting the enclosed 2012 Hazardous Waste Report Certification. The 2012 Hazardous Waste Generator Report was electronically submitted to the Wisconsin Department of Natural Resources on February 27, 2013.

Please contact me at (414) 643-4115 if you have any questions or require additional information.

Sincerely,

SIGMA ENVIRONMENTAL SERVICES, INC

Nicole L. Braun Project Engineer

Enclosure

#### State of Wisconsin

Hazardous Waste Report | 2012

Department of Natural Resources

Bureau of Waste and Materials Management

Reporting Exemption Form

Hazardous Waste Reporting-WA/5 WI DNR PO BOX 7921 Madison, WI 53707-7921

## Stakampandiko alem

WID988638656 EPA ID:

Facility ID : 268232030

THERM TECH OF WALKESHAINC Site Hame :

Site Location: 301 TRAVIS LN

WAUKESHA, WI 53188

Primary NAICS Code: 332811

Wall Address :

301 TRAVIS LN WAUKESHA, WI 53186

मध्यापेक व्यापानस्य सिन्धाः ।

Facility Owner Name:

MARY BETH WIBERG-SPRINGER 5/15/1989

Owner Start Date Facility Owner Type:

PRIVATE

Address

301 TRAVIS LANE

City,State Zip:

WAUKESHA, WI 53188 UNITED STATES

Country Telephone # and Ext.: 262-549-1878

Weischiegen Gestie diteration

WARY BETH WIBERG-SPRINGER VICE PRESIDENT Name/Title

Phone and Ext. IFAX

262-549-1878

Email Address

McwaMary@eol.com

Address

301 TRAVIS LANE WAUKESHA WI 53189-7927

iras Centerinicalina

Name/Title

MARY BETH WIBERG-SPRINGER VICE-PRESIDENT

Phone and Ext. IFAX

262-549-1878

Email Address

M±weMery@eol.com

Address

301 TRAVIS LANE WAUKESHA WI 53189-7927

Marchielponificje och bies ibbie).

Name/Title

NICOLE BRAUN PROJECT ENGINEER

Phone and Ext. FAX

414-643-4115

Email Address

nbraun@inesigmagroup.com

Address

1300 W CANAL ST MILWAUKEE WI 53233

Hazardo	us Waste		6- 65-					
During 2012	Currently in 2013	Generator of Hazardous Waste						
		Large Quantity Generator	Generate in any calendar month 1,000 kg (2,205 lbs) or more of hazardous waste; or Generate in any calendar month, or Accumulate at any time, more than 1 kg (2.2 lbs) of acute hazardous waste or more than 100 kg (220 lbs) of acute hazardous waste spill cleanup material.					
	х	Small Quantity Generator	Generate in every calendar month less than 1,000 kg (2,205 lbs) of hazardous waste; and Accumulate at all times no more than 6,000 kg (13,320 lbs) of hazardous waste; and Generate in every calendar month, and Accumulate at all times, no more than 1 kg (2.2 lbs) of accite hazardous waste and no more than 100 kg (220 lbs) of acute hazardous waste spill cleanup material.					
		Very Small Quantily Generator	Generate in every calendar month no more than 100 kg (220 lbs) of hazardous waste; and Accumulate at all times no more than 1,000 kg (2,205 lbs) of hazardous waste; and Generate in every calendar month, and Accumulate at all times, no more than 1 kg (2.2 lbs) of acute hazardous waste and no more than 100 kg (220 lbs) of acute hazardous waste spill cleanup material.					
×		Non generator	Generate no hazardous waste.					
Yes X No	Yes X No	Treater, Store Hazardous Wa	r, or Disposer of Hazardous Waste at your site AND a Receiver of aste from Off-site					
Yes X No	Yes X No	Treater, Store	r or Disposer of Hazardous Waste at your site AND NOT a Receiver of aste from Off-site					
Yes X No	Yes X No	dedicated pip	ed (Wastewater) Treetment Works (POTW) that accepts hazardous waste (via truck, rail, or e) for treatment, and complies with s. NR 670.001(3)(b)9.					
Yes	Yes	hazardo#s wa	ousehold and Very Small Quantity Generator Hazardous Waste Collection Facility that ships aste off-site to a licensed or permitted hazardous waste treatment, storage or disposal facility,					
X No	X No	or to a recycli	ng facility					

## Reason for not Generating

Never generated

Out of business

Only excluded or delisted waste

Coly non-hazardous waste

Periodic or occasional generator

Waste minimization activity

Other (specify in comments below)

## Reporting Exemption

X For 2012 only

Permanently

You have determined that 2012 reporting is not required, but you anticipate a change in hazardous weste activity during the next year that would place you in a category for which reporting is required. You will be sent materials for next years reporting

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You do not anticipate a change in hazardous waste activity in the future that would place you in a category for which reporting is required. Upon verification of your status change request, you will NOT be sent materials for future reporting

Comments

Name: MARY BETH WIBERG-SPRINGER

TauzBeth W

Title: VICE PRESIDENT

Date of Signature: 2.25.2013

Page 2 of 2

2/21/2013 1:07:53 PM



# Hazardous waste report data received by WI DNR

DNRWaste Management@wisconsin.gov <DNRWasteManagement@wisconsin.gov> To: nbraun@thesigmagroup.com Wed, Feb 27, 2013 at 2:15

This email message acknowledges receipt of your 2012 hazardous waste report.

DNR received this information for 268232030 - THERM TECH OF WAUKESHA INC on 27-FEB-2013: 02:24. The hazardous waste Certification Form (or the Exemption Form if it was completed instead) must be downloaded and printed from the web reporting system. The name of the Waste Report Certifier that was reported in the Contact Types section will be preprinted on the form. That person should sign it, date it and send it to the DNR at the address listed on the form. If you have questions regarding this email, please call your regional hazardous waste contact. Thank you for your participation in using the web reporting system. We are interested in constructive feedback to improve this product. If you have comments, please email your comments to DNRWasteManagement@wisconsin.gov.

Bureau of Waste and Materials Management

Wisconsin Department of Natural Resources



March 17, 2014

Project Reference #10469-005

Ms. Mary Wiberg-Springer Therm-Tech of Waukesha, Inc. 301 Travis Lane Waukesha, Wisconsin 53186

Re: 2013 Hazardous Waste Generator Report

Dear Ms. Wiberg-Springer:

The Sigma Group, Inc. appreciated the opportunity to assist Therm-Tech of Waukesha, Inc. by completing the 2013 Hazardous Waste Generator report. The 2013 report was electronically submitted to the Wisconsin Department of Natural Resources on February 28, 2014. Enclosed please find the Hazardous Waste Report, confirmation of receipt, and supporting documentation for your records.

Please call me at (414) 643-4115 should you have any questions or require additional information.

Sincerely,

THE SIGMA GROUP, INC.

Nicole L. Braun

Project Engineer

Enclosures:



## Hazardous waste report data received by WI DNR

DNRWasteManagement@wisconsin.gov <DNRWasteManagement@wisconsin.gov To: nbraun@thesigmagroup.com

Fri, Feb 28, 2014 at 12:31 PM

This email message acknowledges receipt of your 2013 hazardous waste report.

DNR received this information for 268232030 - THERM TECH OF WAUKESHA INC on 28-FEB-2014: 12:31. The hazardous waste Certification Form (or the Exemption Form if it was completed instead) must be downloaded and printed from the web reporting system. The name of the Waste Report Certifier that was reported in the Contact Types section will be preprinted on the form. That person should sign it, date it and send it to the DNR at the address listed on the form. If you have questions regarding this email, please call your regional hazardous waste contact. Thank you for your participation in using the web reporting system. We are interested in constructive feedback to improve this product. If you have comments, please email your comments to DNRWasteManagement@wisconsin.gov.

Bureau of Waste and Materials Management

Wisconsin Department of Natural Resources



February 28, 2014

Project Reference #10469-005

#### **CERTIFIED MAIL**

Hazardous Waste Reporting – WA/5 Wisconsin Department of Natural Resources P.O. Box 7921 Madison, Wisconsin 53707-7921

Re:

2013 Hazardous Waste Report Certification

Therm-Tech of Waukesha, Inc.

301 Travis Lane Waukesha, WI

Facility ID #268232030

To Whom It May Concern:

The Sigma Group, Inc., on behalf of Therm-Tech of Waukesha, Inc., is submitting the enclosed 2013 Hazardous Waste Report Certification. The 2013 Hazardous Waste Generator Report was electronically submitted to the Wisconsin Department of Natural Resources on February 28, 2014.

Please contact me at (414) 643-4115 if you have any questions or require additional information.

Sincerely,

THE SIGMA GROUP, INC.

Nicole L. Braun

Project Engineer

Enclosure

### State of Wisconsin

Hazardous Waste Report | 2013

Department of Natural Resources

Bureau of Waste and Materials Management

Reporting Exemption Form

Hazardous Waste Reporting-WA/5 WI DNR PO BOX 7921 Madison, WI 53707-7921

## Site Name and Location

EPAID:

WID988638656

Facility ID:

268232030

Site Name :

THERM TECH OF WALKESHA INC

Site Location:

301 TRAVIS LN

WAUKESHA, WI 53186

Primary NAICS Code: 332811

Mail Address:

301 TRAVIS LN

WAUKESHA, WI 53186

#### FACILITY OWNER INFORMATION

Facility Owner Name: MARY BETH WIBERG-SPRINGER Owner Start Date

5/15/1989

Facility Owner Type:

PRIVATE

Address

301 TRAVIS LANE WAUKESHA, WI 53186

City,State Zip:

UNITED STATES

Country

Telephone # and Ext.: 262-549-1878

### Waste Report Certifier Information

Name/Tide

MARY BETH WIBERG-SPRINGER VICE PRESIDENT

Phone and Ext. IFAX

262-549-1878 MbwsMary@aol.com

Email Address Address

301 TRAVIS LANE WAUKESHA WI 53189-7927

#### Waste Contact Information

Name/Title

MARY BETH WIBERG-SPRINGER VICE-PRESIDENT

Phone and Ext. (FAX Email Address

262-549-1878

MbwsMary@aol.com

Address

301 TRAVIS LANE WAUKESHA WI 53189-7927

### Waste Report Preparer Information

Name/Title

MICOLE BRAUN PROJECT ENGINEER

Phone and Ext. /FAX

414-643-4115

Email Address

nbraun@thesigmagroup.com

Address

1300 W CANAL ST MILWAUKEE WI 53233

Hazardo	ous Waste	Activity	1						
During 2013	Currently In 2014	Generator of Hazardous Waste							
- <del></del>		Large Quantity Generator	Generate in any calender month 1,000 kg (2,295 lbs) or more of hazerdous waste; er Generate in any calendar month, or Accumulate at any time, more than 1 kg (2.2 lbs) of acute hazardous waste or more than 100 kg (220 lbs) of acute hazardous waste spift cleanup meterial.						
		Smail Quantity Generator	Generate in every calendar month less than 1,000 kg (2,205 lbs) of hazardous waste; and Accumulate at all times no more than 6,000 kg (13,320 lbs) of hazardous waste; and Generate in every calendar month, and Accumulate at all times, no more than 1 kg (2,2 lbs) of acute hazardous waste and no more than 160 kg (220 lbs) of acute hazardous waste split cleanus insteriol.						
A Company of the Comp		Very Small Quantity Generalor	Generate in every calcular month no more than 100 kg (220 lbs) of hazardous waste; and Accumulate at all times no more than 1,000 kg (2,205 lbs) of hazardous waste; and Generate in every calcular month, and Accumulate at all times, no more than 1 kg (2.2 lbs) of acute hazardous waste and no more than 100 kg (220 lbs) of acute hazardous wosts spill cleanup material.						
X	X	Non generator	Generate no hazardous waste.						
Yes X No	Yes X No	Treater, Store: Hozardous Wa	, or Disposer of Hazardous Wasto at your site AND a Receiver of age from Off-site						
Yes X No	Усь Х No		or Disposer of Hazardous Weste at your site AND NOT a Receiver of sle from Off-site						
Yes X No	Yes X No	Publicly Owne dedicated plps	d (Wastewater) Treatment Works (POTW) that accepts hazardous waste (via truck, rall, or ) for treatment, and compiles with s. NR 670.001(3)(6)9.						
Yæs X No	Yes X No	Permanent Hos hazardous was or to a recyclic	usehold and Very Small Guanthy Generator Hezerdous Waste Collection Facility that ships ste off-site to a licensed or permitted hazardous waste treatment; storage or disposal facility, ig facility						

Reas	on for not Generating	
	Nover generated	Periodic or occasional generator
	Out of business	Wasta minimization activity
	Only excluded or delisted waste	Other (specify in comments helow)
х	Only non-hazardous waste	

## Reporting Exemption

For 2013 only

You have determined that 2013 reporting is not required, but you anticipate a change in hazardous waste activity during the noxt year thouwould place you in a catagory for which reporting is required. You will be sent intelerials for next years reporting

Permanently

You do not anticipate a change in hazardous waste activity in the future that would place you in a category for which reporting is required. Upon verification of your status change request, you will NOT be sent materials for future reporting

Comments

Name: MARY BETH WIBERG-SPRINGER

Title: VICE PRESIDENT

Date of Signature:

Therm-Tech of Waukesha, Inc. WID988638656 January 13, 2015

# ATTACHMENT E: Hazardous Waste Manifests

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1126 South 70th Street Suite N408B West Allis, WI 53214 www.advancedwasteservices.com (414) 475-3100 Fax: (414) 475-4496

#### Bill To

Attn: Alana Therm Tech of Waukesha 301 Travis Lane Waukesha WI 53186 United States

## **Payment Document**

Date Invoice # 12/6/2011 174954

Due Date PO# Upon receipt 5874

Results Advisor Phone Number Brushwood, James L.

Fax Number Memo (262) 549-1878 (262) 549-4320

i lifetiff ippli of regardance	Marrie I	Disposal Haz Waste Non Bulk	3   55 Gat, Dr 1   Load	1.25 3.75
Therm Tech of Waukesha 12/6	5/2011	Transportation	Load	

Total

\$735.00

Need to schedule a Load?

Call our Results Delivery Group at (866) 475-3110

or

Schedule a Load online @ www.advancedwasteservices.com.

Click on the Pickup Tab and place your order.

This Payment Document may reflect an increase in the fuel surcharge that is necessary to help us manage the recent increase in the market price for diesel fuel.

Contact Advanced Waste Services at 800-842-9792 within 30 days of the invoice date for any and all billing discrepancies.

Transforming Today's Wastes Into Tomorrow's Resources!

We accept American Express, Mastercard, Visa and Diner's Club

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Purchase Order No.

5874

Therm-Tech of Waukesha 301 Travis Lane Waukesha, Wisconsin 53189 262-549-1878 fax 262-549-4320

			URCHASE C	)RDER =
Name Address City Phone	Advanced Waste Services  1126 S. 70th St. Suite N408B  West Allis St WI ZIP 53214  800-842-9792 fax 414-475-4496	Address 301 Tr	-Tech of Waukesha avis Lane esha St Wi 19-1878	ZIP 53189
Qty	Units Descrip	tion	Unit Pri	ice TOTAL
3	bbl waste sludge w/chrome (evap slu	dge)		\$0.00
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Therm-Tech of Waukesha, Inc. WID988638656 January 13, 2015

# ATTACHMENT F: Emergency Response Plan

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# ThermTech of Waukesha Emergency Response Plan

**Emergency Phone Numbers:** 

Fire Department:

Non-Emergency Phone: (262) 524-3651

Fax: (262) 524-3670

In an Emergency Call: 911

Police Department:

Emergency: 911

Non Emergency: 262-524-3831

**DNR Wisconsin:** 

General Information: 1-888-936-7463

Violation Hotline: 1-800-847-9367

Emergency Spill Hotline: 1-800-943-0003

We Energy (GAS/Electric)

Electric emergencies and power outages

800-662-4797 — 24 hours a day

Do not use email.

Natural gas emergencies and leaks

800-261-5325 — 24 hours a day

Do not use email.

#### **Intent and Purpose**

The following Emergency Response Contingency Plan is for the entire ThermTech campus/facilities. The purpose of this plan is to protect the safety and welfare of the employees and the community in the event of an emergency response incident and to comply in every way with Federal and State laws pertaining to our facility operations with respect to preparedness and prevention of emergency events.

The Emergency Response Contingency Plan is intended as a guide of emergency procedures in the event of fire, spills, weather and medical events. This document is also intended as a reference source to familiarize employees with procedures and important contact information.

## **Emergency Internal Notification Process**

In the event of an emergency at any of the ThermTech facilities, after clearing the immediate area of any and all personnel from the event, make an announcement on the page system (1654) as calmly as possible calling attention in the plant, what the emergency is, where it is located (building and specific area) and by name the Emergency Coordinator (on Crew Foreman or above are in this position).

Emergency Coordinators have been supplied with appropriate communication devices (cell phones) to alert them in the occurrence of an emergency. The Primary Emergency Coordinator will be contacted first; if they are not available the alternate Emergency Coordinators should be called in the order listed. Who the Primary contact is will depend on the time of the event.

The Emergency Coordinators have been selected based on their familiarity with the ThermTech facilities, the Emergency Response Contingency Plan, operation and activities at the facilities, the location and characteristics of possible dangers, the locations of records within the facilities and facility layouts.

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Emergency Telephone List	СР-3
Control Procedures:	
Fires/Explosions/Weather	СР-4
Spills (Salt)	СР-8
Medical	CP-9
Media	CP-9

## CP-2

## **Contact List**

## Managers

Steve Wiberg Sr, President262-613-0530
Mary Wiberg-Springer, VP414-640-8719
Alana Riemer, HR414-881-3749
Kirk Springer, General Production Manager262-844-2219
Mark Schlaikowski, Plant Engineer414-940-9245
Steve Rivett, Maintenance Manager262-358-1189
By Building
301, 303, & 305 Foreman:
Bill Gallagher, 1 <sup>st</sup> shift262-853-8094
David Land, 2 <sup>nd</sup> shift262-613-0838
Freddy Perez, 3 <sup>rd</sup> shift262-613-0849
303 & 305 Plant Manager:
DJ Gallagher262-613-0796
Pearl Street Plant Manager:
Craig Springer262-613-0844
Pearl Street Foreman:
Brian Caswell, 1 <sup>st</sup> shift262-613-0835
Brandon Medinger, 2 <sup>nd</sup> shift262-988-6137

## **ThermTech Emergency Action Plan**

#### Escape Routes

This document describes ThermTech's evacuation procedure. The procedure is divided into eight sections that describe when and how to evacuate, employee responsibility upon evacuation, and the notification of local emergency responders.

## I. When is evacuation necessary?

- a. When a fire moves beyond the incipient stage, involves flammable solvents, is uncontained and spread beyond 60 square feet, or is hidden behind a wall or ceiling and cannot be reached from a standing position.
- b. If the fire creates smoke or other products of combustion that that make the use of respirators necessary.
- c. If the fire is of a magnitude that makes it unapproachable within 15 feet or the effective range of the fire extinguisher or if you must crawl on the floor due to heat or smoke.
- d. If the fire is not contained and fire, heat or smoke threatens to block your escape path.
- e. If any pressurized tank is ruptured including nitrogen, ammonia, oxygen, propane or nitrous oxide.

f. When to shelter in place—In the event of a tornado, employees should remain in the building and take shelter in the designated tornado shelter areas. The tornado shelter areas are highlight on Map I below.

#### II. Evacuation Routes-Where to Exit

a. Employees should use the nearest exit that provides a clear, fire and smoke free path. Each work area contains one primary exit route that should be used unless that route is blocked. Each work area contains at least one secondary exit route in the event that the primary route is unusable.

#### CP-5

## I. Evacuation of Visitors

- a. It is ThermTech's policy not to allow visitors to enter or tour the shop unless accompanied by a ThermTech employee(s). Therefore it is the accompanying employee(s) responsibility to guide any visitors to the nearest safe evacuation route and out of the building.
- b. In the event of a tornado, the accompanying employee(s) is responsible for guiding any visitors to the nearest tornado shelter.

## II. Meeting Areas

- a. It is of critical importance that each employee and visitor is accounted for if an evacuation is necessary. Centralized and specific meeting areas are required to ensure this takes place.
- b. Upon evacuation, each employee and visitor must go to ThermTech Doctors clinic parking area.
- c. Any employee and/or visitor that are not accounted for will be considered to still be in the building(s). To prevent emergency services from looking for and attempting to rescue someone whom is already safe, it is of utmost importance that each employee come to the meeting area immediately.
- d. Every employee is encouraged to help any injured parties reach the meeting area provided this act does not jeopardize their own safety.

#### CP-6

- III. Employee Count/Verification Responsibility: The senior supervisor for each respective building is responsible for taking a head count and verifying that each employee in his charge are accounted for. The senior supervisor is responsible for passing complete information on to emergency services upon their arrival. The supervisor should pass on the following information at a minimum:
  - a. Are all employees accounted for?

- b. If someone is missing, who is missing a where are they assigned (where should they be)?
- c. Any injuries that need treatment.
- d. It is at the supervisors discretion if any other pertinent information should be passed on that is not included in the above list.

## VI. Notification of Emergency Services (Fire Department)

- a. Notification of emergency services is to be done using the 911 system
- b. The responsibility of alerting emergency services is two-fold:
  - i. The employee who initiates the evacuation by alerting the plant with an emergency page must alert emergency services. The employee must not endanger himself while calling 911; this should be done from a safe location.

#### CP-7

- ii. The senior department supervisor must alert emergency services as back up to letter (i.) above. The second alert
- iii. Is used in case the alerting employee is unable to safely access a phone.

## VII. Securing Medical Assistance

- a. Upon evacuation and employee count/verification, the senior supervisor must alert emergency services of any employee who has suffered an injury.
- b. Employees trained in first aid are encouraged to assist injured employees. If assistance is being rendered, another employee must be dispatched to alert emergency services.

VIII. Critical Plant Shutdown: In the event of an evacuation, the first critical plant shutdown required is to close the main gas valve located on the northwest side of the 301 building. It is the responsibility of the 301 buildings senior supervisor under direction of Plant manager or above to close the valve.

**Spills (salt):** In the event that an overflow spill occurs, area of spill will be cordoned off immediately. Supervisor will be notified and they will assess the incident and if any other immediate actions are necessary. No one will be permitted to enter the cordoned off area until the supervisor deems the area safe, which will include salt cooling to a hardened state. This will ensure salt will not burn any personnel and salt will not spread further while still in a liquefied state.

#### CP-8

**Medical:** In the event of a medical emergency no matter the severity, Supervisors are to be notified immediately and they will make the appropriate calls needed depending on the event.

Media: If contacted by members of the media, direct all their questions to Mary Springer.

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Therm-Tech of Waukesha, Inc. WID988638656 January 13, 2015

# ATTACHMENT G: Shot Blast Dust Information

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# CONNELLY - GPM, INC.

ESTABLISHED 1375
3154 SOUTH CALIFORNIA AVENUE CHICAGO, ILLINOIS 60608-5176
PHONE: (773) 247-7231 • www.ConnellyGPM.com • FAX: (773) 247-7239

Sent Via E-mail: DavidSamberg@aol.com

January 22, 2015

David Samberg Premier Metals 317-727-6148

Re: Use of Therm Tech Iron Dust

Dear David:

As we discussed earlier, the Iron Dust you supply to us from Therm Tech is incorporated into our Connelly-GPM. Inc. Iron Sponge gas-purification product. The dust is mixed with wood shavings and oxidized into the surface of the wood. The wood acts as an inert carrier, and the iron oxide reacts to remove H<sub>2</sub>S and mercaptans from gas sources (typical applications include natural gas wells, landfill and digester methane sources and air sources such as sewer lift stations).

The removal of these sulfur sources prevents pipe corrosion, engine corrosion, and the release of sulfur into the atmosphere (causing acid rain).

Please see the attached Iron Sponge Literature book and MSDS.

Sincerely,

Galen Dixon

Technical Director

Attach.

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#### Material Safety Data Sheet

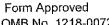
(Reproduce locally)

May be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200 and Canadian Hazardous Protection Act and Controlled Products Regulation.

U.S. Department of Labor

Occupational Safety and Health Administration

(Non-Mandatory From)



OMB No. 1218-0072 Standard must be consulted for specific requirements. IDENTITY (As Used on Label and List) IRON SPONGE (Label) NOTE: Blank spaces are not permitted. If an item is not applicable

OSHA 174 Sept 1985

Also known as IRON SPO INTENDED USE: H <sub>2</sub> S Removal fron					
Section I					
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CONNELLY-GPM, INC.		(773) 247-7231			
Address (Number, Street, City, State, and	ZIP Code)	Telephone Number for Information			
		(773) 247-7231			
3154 South California Avenue		Date REVISED	3/11/2013	_	
Chicago, IL 60608-5176		Date Printed	4/16/2013	3	
		Signature of Prepar	rer (optional)		
Section II - Hazardous Ingredie	ents/Identity Inform	iation			
Hazardous Components				Canada	LD50/
(Specific Chemical Ident	tity; Common Name)	OSHA PEL	ACGIH	TWAEV	LC50
IRON OXIDE CAS #1309-37-1	(15-40%)	10mg/m <sup>3</sup>	5mg/m <sup>3</sup>	5mg/m <sup>3</sup>	Not Avail.
SODIUM CARBONATE CAS #4	97-19-8 (1-5%)	No TLV Esta	blished		Not Avail.
SODICINI CANDOTATE DAO #4	07 10 0(1 070)	110121200			
CALCIUM CARBONATE; LIMES	STONE (1-5%)	15mg/m <sup>3</sup> TTL	10mg/m <sup>3</sup>	10mg/m <sup>3</sup> TT	L Not Avail.
CAS #1317-65-3	313114 (1 3 1 3 )	5mg/m <sup>3</sup> Resp			
		Suidill Izesb			
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SHIPPING CLASS: 50 Section III - Physical/Chemica Boiling Point Water	I Characteristics	ZARDOUS, NO		MBER NEE	
SHIPPING CLASS: 50 Section III - Physical/Chemica Boiling Point Water	l Characteristics	ARDOUS, NO		MBER NEE	
SHIPPING CLASS: 50 Section III - Physical/Chemica Boiling Point Water Vapor Pressure (mm Hg)	I Characteristics	ARDOUS, NO		MBER NEE	0.7-0.9
SHIPPING CLASS: 50 Section III - Physical/Chemica Boiling Point Water Vapor Pressure (mm Hg)	I Characteristics	ARDOUS, NO	<sub>2</sub> O = 1)	MBER NEE	0.7-0.9
SHIPPING CLASS: 50 Section III - Physical/Chemica Boiling Point Water Vapor Pressure (mm Hg)	I Characteristics 212°F N/A	ARDOUS, NO Specific Gravity (H Melting Point Evaporation Rate	<sub>2</sub> O = 1)	MBER NEE	0.7-0.9 N/A
SHIPPING CLASS: 50 Section III - Physical/Chemica Boiling Point Water Vapor Pressure (mm Hg) Vapor Density (AIR = 1)	I Characteristics 212°F N/A	ARDOUS, NO Specific Gravity (H Melting Point Evaporation Rate	<sub>2</sub> O = 1)	MBER NEE	0.7-0.9 N/A
SHIPPING CLASS: 50  Section III - Physical/Chemica  Boiling Point  Water  Vapor Pressure (mm Hg)  Vapor Density (AIR = 1)  Solubility in Water  Insoluble  Apearance and Odor	212°F N/A N/A	Specific Gravity (H Melting Point Evaporation Rate (Butyl Acetate = 1)	<sub>2</sub> O = 1)	MBER NEE	0.7-0.9 N/A
SHIPPING CLASS: 50  Section III - Physical/Chemica  Boiling Point  Water  Vapor Pressure (mm Hg)  Vapor Density (AIR = 1)  Solubility in Water  Insoluble  Apearance and Odor  Moist Brown Wood	I Characteristics  212°F  N/A  N/A  A Chips with Wood C	Specific Gravity (H Melting Point Evaporation Rate (Butyl Acetate = 1)	<sub>2</sub> O = 1)	MBER NEE	0.7-0.9 N/A
SHIPPING CLASS: 50  Section III - Physical/Chemica  Boiling Point  Water  Vapor Pressure (mm Hg)  Vapor Density (AIR = 1)  Solubility in Water  Insoluble  Apearance and Odor	I Characteristics  212°F  N/A  N/A  A Chips with Wood C	Specific Gravity (H Melting Point Evaporation Rate (Butyl Acetate = 1)	<sub>2</sub> O = 1)	MBER NEE	0.7-0.9 N/A
SHIPPING CLASS: 50  Section III - Physical/Chemica  Boiling Point Water  Vapor Pressure (mm Hg)  Vapor Density (AIR = 1)  Solubility in Water Insoluble  Apearance and Odor Moist Brown Wood	I Characteristics  212°F  N/A  N/A  A Chips with Wood C	Specific Gravity (H Melting Point Evaporation Rate (Butyl Acetate = 1)	<sub>2</sub> O = 1)	MBER NEE	0.7-0.9 N/A
SHIPPING CLASS: 50  Section III - Physical/Chemica  Boiling Point  Water  Vapor Pressure (mm Hg)  Vapor Density (AIR = 1)  Solubility in Water  Insoluble  Apearance and Odor  Moist Brown Wood  Section IV - Fire and Explosio	212°F N/A N/A Chips with Wood Con Hazard Data	ARDOUS, NO Specific Gravity (H  Metting Point  Evaporation Rate (Butyl Acetate = 1)	<sub>2</sub> O = 1)		0.7-0.9 N/A N/A
SHIPPING CLASS: 50  Section III - Physical/Chemica Boiling Point Water Vapor Pressure (mm Hg)  Vapor Density (AIR = 1)  Solubility in Water Insoluble Apearance and Odor Moist Brown Wood Section IV - Fire and Explosio Flash Point (Method Used) Non-Flammable unless water is Extinguishing Media	I Characteristics  212°F  N/A  N/A  I Chips with Wood Con Hazard Data	Specific Gravity (H.  Metting Point  Evaporation Rate (Butyl Acetate = 1)  Odor  Flammable Limits	<sub>2</sub> O = 1)		0.7-0.9 N/A N/A
SHIPPING CLASS: 50  Section III - Physical/Chemica  Boiling Point  Water  Vapor Pressure (mm Hg)  Vapor Density (AIR = 1)  Solubility in Water  Insoluble  Apearance and Odor  Moist Brown Wood  Section IV - Fire and Explosio  Flash Point (Method Used)  Non-Flammable unless water is  Extinguishing Media	212°F N/A N/A Chips with Wood Con Hazard Data	Specific Gravity (H.  Metting Point  Evaporation Rate (Butyl Acetate = 1)  Odor  Flammable Limits	<sub>2</sub> O = 1)		0.7-0.9 N/A N/A
SHIPPING CLASS: 50  Section III - Physical/Chemica  Boiling Point  Water  Vapor Pressure (mm Hg)  Vapor Density (AIR = 1)  Solubility in Water  Insoluble  Apearance and Odor  Moist Brown Wood  Section IV - Fire and Explosio  Flash Point (Method Used)  Non-Flammable unless water is  Extinguishing Media	I Characteristics  212°F  N/A  N/A  I Chips with Wood Con Hazard Data	Specific Gravity (H.  Metting Point  Evaporation Rate (Butyl Acetate = 1)  Odor  Flammable Limits	<sub>2</sub> O = 1)		0.7-0.9 N/A N/A
SHIPPING CLASS: 50  Section III - Physical/Chemica Boiling Point  Water  Vapor Pressure (mm Hg)  Vapor Density (AIR = 1)  Solubility in Water  Insoluble  Apearance and Odor  Moist Brown Wood  Section IV - Fire and Explosio  Flash Point (Method Used)  Non-Flammable unless water is  Extinguishing Media  Water, Sand, Dry (Method Dry (Method Used))	I Characteristics  212°F  N/A  N/A  I Chips with Wood Con Hazard Data	Specific Gravity (H.  Metting Point  Evaporation Rate (Butyl Acetate = 1)  Odor  Flammable Limits	<sub>2</sub> O = 1)		0.7-0.9 N/A N/A
SHIPPING CLASS: 50  Section III - Physical/Chemica  Boiling Point  Water  Vapor Pressure (mm Hg)  Vapor Density (AIR = 1)  Solubility in Water  Insoluble  Apearance and Odor  Moist Brown Wood  Section IV - Fire and Explosio  Flash Point (Method Used)  Non-Flammable unless water is  Extinguishing Media  Water, Sand, Dry of Special Fire Fighting Procedures	I Characteristics  212°F  N/A  N/A  I Chips with Wood Con Hazard Data	Specific Gravity (H.  Metting Point  Evaporation Rate (Butyl Acetate = 1)  Odor  Flammable Limits	<sub>2</sub> O = 1)		0.7-0.9 N/A N/A

Section V -	Reactivity Da	ıta						
Stability	Unstable:		Confitions to A	oid:	Do No	t Allow to D	ry Out	
	Stable:	Х						
Incompatibility	(Materials to Avoid	1)						
Incompatibility	(Materials to Avoic	1)	•		-		•	
	Tu	1	T		· · · · · · · · · · · · · · · · · · ·			
Hazardous	May Occur		Contitions to A	oid:				
Polymerization		X					·····	<del></del>
	Health Haza							
Route(s) of Ent	ry	Inhalation?		Skin?			Ingestion?	
Looth Lozarda	(Acute and Chror	Yes		Yes			Yes (not likely)	
Hediui Hazaius	•	gestion may i	irritata naga	morith f	broot b	unas ond s	tomach	
		-					olonged contact.	
	1 TOUGGETTIAY	imale of bui	n eyes and c	ause sr	iii iiiilal	ion aitei pri	Jiongeu contact.	
Carcinogenicity	-	NTP?		IADC M	onographs		OSHA Regulated	
Odrosnogenieny	•	1411	NO INFORM				OSI IA Negulated	
Signs and Symi	ptoms of Exposure	<del>}</del>		" 1110IV	, VI THE	·VLL		
			on. <i>Inhalatio</i>	n may d	ause no	ose, mouth.	, throat, and/or lung im	itation.
	may cause mo					, ,	,	
	ons Generally Ago							
	Any skin, eye	, mucous me	mbrane, or n	espirato	ry disea	ises sensitir	ve to particulate dust.	
							·	
	t Aid Procedures							
							water as soon as pos	
Inhalation: I	Remove to fre	sh air. <i>Inges</i> i	tion: Drink la	rge amo	ounts of	water. DO	NOT INDUCE VOMI	TTING!
<b>GET MEDIC</b>	AL ATTENTIO	ON						
Section VII	- Precautions	for Safe Hai	ndling		tion bear bear and the second			
	en in Case Materi							
	If the materia	l is spilled, no	rmal clean u	p procee	dures m	ay be used	<u>.</u>	
	Clean up per	sonnel should	be wearing	the prop	er prote	ective equip	ment.	
Waste Disposal	Method							···
	Sanitary land	fill, following	Federal, Stat	e, and L	ocal gui	idelines.		
Precautions to E	3e Taken in Handi	-						
			o dry out, as	it will hir	nder per	rformance a	and may cause a	
	particulate dε	ıst problem.						
Other Precautio			•					
	Not Applicable	e						
	,	<del></del>	·····					
and the same	- Control Mea							
Respiratory Prof	lection (Specify Ty							
	Use NIOSH a	pproved dust	t masks					
Ventilation	Local Exhaust				Special			
		If necessary				Not Applica	able	
	Mechanical (Gen	•			Other			
		Not Applicab	e			Not Applica	ible	
Protective Glove	_			Eye Prote				
	Non-absorbe		es		OSHA:	approved g	lasses/goggles	
Other Protective	Clothing or Equip							
141 161	Clothing that	exposes as li	ttie skin as po	ossible t	o the iR	ON SPON	<u>GE</u>	
Work/Hygenic P								
DAEVOEL MACO	Keep dusting SMSDS Sponge.	to a minimun					11 C O D O 3000 101	500/4====
いいことでに「MODY	awrana abonges	CI2	Page	2		☆	U.S.G.P.O.: 1986-491-5	o∠9/45//5

#### Section IX - Toxic Substances Control Act Regulations

IRON CAS #1309-37-1

XU (exempt)

SODIUM CARBONATE CAS #497-19-8

Not Listed

CALCIUM CARBONATE; LIMESTONE CAS #1317-65-3

Not Listed (This is pure calcium carbonate,

not natural limestone)

#### Section X - Toxics Release Inventory

IRON CAS #1309-37-1

Not Listed

SODIUM CARBONATE CAS #497-19-8

Not Listed

CALCIUM CARBONATE; LIMESTONE CAS #1317-65-3

Not Listed (This is pure calcium carbonate, not natural limestone)

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Therm-Tech of Waukesha, Inc. WID988638656 January 13, 2015

# ATTACHMENT H: Inspection Checklist

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#### **VERY SMALL QUANITY GENERATOR INSPECTION**

This Inspection Form, used for the inspection of facilities that generate less than 100 kg (220 ibs) of non acute hazardous waste in a calendar month or less than 1 kg (2.2 lbs) of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

ection 1: Waste Information		
A. A hazardous waste determination has been made on each solid waste generated (NR 662.011). Aerosol Con wastes	X	662.220(6)(a)
B. The waste determination has been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used (NR 662.011(3)).		662.220(6)(a) Photo
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers (NR 662.011(3)(a)1.).		662.220(6)(a) Photo
D. Waste is shipped to an approved or exempt facility.	<u> </u>	662.220(6)(e)
ection 2: Manifest Requirements		
		/
A. Generator uses a manifest to ship hazardous waste. If NO, go to Section 3.		Photo _
B. Generator submitted a notification form and obtained an EPA identification number.	. 🗸	662.220(6)(f)1
C. The manifest is used according to the instructions in the appendix to 40 CFR part 262 (NR 662.020(1)).		662.220(6)(f)2
<ul> <li>D. A facility that is permitted or licensed to accept the waste is designated on the manifest (NR 662.020(2)).</li> </ul>		662.220(6)(f)2
E. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility (NR 662.023(3)).	NA	662.220(6)(f)2 Photo
F. If the manifest copy signed by the receiving facility is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery was submitted to the department (NR 662.193(2)).	NA	662.220(6)(f)3 Photo
G. Generator retains a copy of the manifest signed by the generator until the signed copy from the designated facility is received (NR 662.040(1)).		662.220(6)(f)4
H. A copy of each manifest is kept for at least three years from the date of shipment (NR 662.040(1)).	<b>/</b>	662.220(6)(f)4
ection 3: On Site Storage in Containers	designation.	
A. Generator accumulates waste in containers. If NO, go to Section 4.	./	Photo _
B. The contents of a container that is leaking or in poor condition are transferred to another container in good condition (NR 665.0171).	NA	662.220(6)(c)1
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#### **VERY SMALL QUANITY GENERATOR INSPECTION**



ection 3: On-Site Storage in Containers	ALUERADO DA SE	
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C. Containers are made or lined with materials compatible with the waste (NR 665.0172).		662.220(6)(c)1
·	. 🗸	Photo _
D. O. daine and the standard of the standard of the standard was to AID		660 000(6)(6)(1
D. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	NA	662.220(6)(c)1
Not observed	191	Photo _
E. Incompatible wastes are stored in separate containers unless the mixing will not generate	4	662.220(6)(c)1
extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	NA	Photo _
F. Containers are marked with the words, "Hazardous Waste".	NA	662.220(6)(c)2
Not observed	1 4/24	Photo
Section 4: Used Oil		
A. Used oil is managed on-site. If NO, go to Section 5.		,
		Photo
B. Used oil containers and tanks are in good condition and not leaking.		679.22(2)
S. South of the state of the st		Photo
		1 HOW
C. Used oil containers and tanks are marked "used oil".		679.22(3)(a)
		Photo
D. T		679.24
<ul> <li>D. Transporter has an EPA ID number, except when the generator self-transports or has a tolling agreement.</li> </ul>		[ L
colling agreement.		Photo
E. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1	A (A	
gallon of absorbent results from a non-routine spill.	NA	Photo
F. If used oil is burned in an on-site used oil-fired space heater, all of the following are met:	1.//	679.23
<ol> <li>Only used oil from the generator or household do-it-yourselfers is burned.</li> <li>The heater is designed with a maximum capacity of 0.5 million BTU per hour or less.</li> </ol>	NA	Photo _
The neater is designed with a maximum capacity of 0.5 million B to per nour or less.  3. The combustion gases are vented to the ambient air.		V
G. If used oil is accepted from others or sent off-site to be burned in a space heater, the used	1	679.11
oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	NA	Photo
		11000
Section 5: Generator Status Evaluation		
		(A) 1995 A) Algebra (A) Algebra (A) A beautiful framework of the second
		/
A. Less than the 220 lbs. (100 kg) of non-acute hazardous waste is generated in any month.	1 7	662.220(6)
Them Tech is an episodic generator, no haz waste on site during inspect		Photo
	<u> </u>	eco conceyth)
B. Less than 2,205 lbs. (1000 kg) of non-acute hazardous waste is accumulated.	_	662.220(6)(b)
•		Photo
C. Describe other hazardous waste activities the generator is conducting at the facility.	]	}
	#	Photo
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# Revision: 10/31/2011 WASTE & MATERIALS

#### **VERY SMALL QUANITY GENERATOR INSPECTION**

: 10/31/2011 & MATERIALS				
MENT PROGRAM			······	
on 5: Conorator Status Eva	nation			
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	luation	oninteriore de la companya de la co		
		ani na katana na kat	n de la companya de l	
e e e e e e e e e e e e e e e e e e e	Generator status is confirmed by thi			

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